

Indiana Department of Environmental Management

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Joseph E. Kernan Governor

Lori F. Kaplan Commissioner

September 8, 2004

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: Global Composites, Inc. / 039-18714-00493

FROM: Paul Dubenetzky

Chief, Permits Branch Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, within eighteen (18) calendar days from the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- the date the document is delivered to the Office of Environmental Adjudication (OEA): (1)
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3)The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- the name and address of the person making the request; (1)
- (2) the interest of the person making the request;
- identification of any persons represented by the person making the request; (3)
- the reasons, with particularity, for the request; (4)
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, (6)would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

> Enclosures FNPER-AM.dot 9/16/03





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September 8, 2004

Mr. Gary Beck Global Composites, Inc. 28967 US 33 West Elkhart, IN 46516

Re: **039-18714**

Second Administrative Amendment to

Part 70 039-7574-00493

Dear Mr. Beck:

Global Glass, Inc. was issued a permit on March 28, 2002, for a fiberglass and plastic parts manufacturing source. A letter requesting several changes to the permit was received on March 23, 2004.

The requested changes are summarized as follows:

- The addition of one (1) non-atomized spray application system to the chop/lamination booth in Plant 1. This equipment is being added to increase manufacturing flexibility, and does not represent an increase in production capacity or in the potential to emit. The potential to emit from this facility is based on a production rate of 19 parts per hour, which will not change.
- 2. The addition of one (1) non-atomized spray application system to the resin reciprocator flat panel operation in Plant 4. This equipment is also being added to increase manufacturing flexibility, and does not represent an increase in production capacity or in the potential to emit. The potential to emit from this facility is based on a production rate of 5 flat panels per hour, which will not change.
- 3. The addition of one (1) 7,000 gallon resin storage tank, known as Tank 301, at Plant 3, and one (1) 4,000 gallon resin storage tank, known as Tank 102, at Plant 1. These tanks will replace resin storage currently done using 250 gallon totes. Fugitive styrene emissions from the totes are currently included in the quarterly emission reports from the source. These tanks will have VOC and HAPs emissions of less than one pound per day, and will therefore be considered insignificant activities.
- 4. The corporate name has changed from Global Glass, Inc. to Global Composites, Inc.. This change will be incorporated into the permit.

The Office of Air Quality has determined that these changes will cause no increase in the potential to emit or in actual emissions of any criteria pollutant or HAP at the source. Therefore, the changes can be incorporated into the permit administratively. The changes to the permit are shown in the attached Technical Support Document (TSD).

Permit Reviewer: PTB/MES

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Patrick Brennan, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely, Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments PTB/MES

cc: File - Elkhart County

U.S. EPA, Region V

Elkhart County Health Department

Northern Regional Office

Air Compliance Section Inspector - Greg Wingstrom

Compliance Branch

Administrative and Development

Technical Support and Modeling - Michele Boner



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Global Composites, Inc. 58190 County Road 3 South Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7574-00493				
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007			

1st Administrative Amendment No.: No. 039-15911-00493 Issuance Date: October 8, 2002

Second Administrative Amendment No.: AA 039-18714-00493	Sections Affected: A.3, A.4, D.1, D.2, and all Reporting Forms
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:September 8, 2004

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Global Composites, Inc. Elkhart, Indiana Permit Reviewer: PTB/MES Page 5 of 56 T 039-7574-00493

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass and plastic parts manufacturing source.

Responsible Official: Gary Beck

Source Address: 58190 County Road 3 South, Elkhart, Indiana 46517

Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516

SIC Code: 3089 County Location: Elkhart

Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This fiberglass and plastic parts manufacturing company consists of four (4) plants:

- (a) Plant 1 is located at 28967 U.S. 33 West, Elkhart, Indiana;
- (b) Plant 2 is located at 28967 U.S. 33 West, Elkhart, Indiana;
- (c) Plant 3 is located at 56807 Elk Park Drive, Elkhart, Indiana; and
- (d) Plant 4 is located at 58190 County Road 3 South, Elkhart, Indiana.

Since the four (4) plants are located on adjacent properties, have similar SIC codes, have support relationships, and are owned by one company, they will be considered as one (1) source. This determination was made previously in CP 039-9601-00493, issued on August 31, 1998, and has been reviewed in May 2001 at the request of the applicant. The official address for the combined source is Plant 4, and all four (4) plants will report emissions under the Plant ID for Plant 4, which is 00493.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plants 1 and 2 - US 33 West

- (a) One (1) metton injection area, known as MIJB1, constructed in 1994, equipped with four (4) metton injection presses, each with a maximum capacity of 50 parts per hour, emissions are uncontrolled and exhausting to stack SV204.
- (b) One (1) metton painting area, consisting of one (1) paint booth, known as MPB, constructed in 1994, and later updated to meet OSHA requirements, with one (1) paint mixing area. The paint booth is equipped with HVLP spray equipment, with a maximum capacity of 200 parts

- per hour, using dry filters as control equipment, and exhausting to stack SV207.
- (c) One (1) metton post final/final finish area, known as MFF, constructed in 1994, equipped with HVLP spray equipment, with a maximum capacity 200 parts per hour, equipped with dry filters for air pollution control, and exhausting to stack SV207.
- (d) One chop lamination booth, equipped with non-atomized spray application equipment, with a maximum capacity of 19 fiberglass parts per hour, using dry filters for overspray control, and exhausting to stack SV101.
- (e) One (1) Magnum portable air assisted airless gel coat system with a maximum capacity of 19 fiberglass parts per hour, using dry filters for overspray control, and exhausting to stack SV205.
- (f) One (1) metton grinding area, known as MGB, constructed in 1994, with a maximum capacity 200 parts per hour, equipped with dry filters and a water wash system as control equipment, and exhausting inside the building.

Plant 3 - Elk Park Drive

- (g) One (1) gel coat booth, known as Booth B, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV301.
- (h) One (1) lamination booth, known as Booth A, constructed in 1996, with a maximum capacity 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV302.
- (i) One (1) grinding booth, known as Booth C, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, equipped with a water wash system as control equipment.

Plant 4 - County Road 3 South

- (j) One (1) custom gel coat booth, identified as SV401, constructed in 1998, equipped air assisted airless spray equipment and dry filters for overspray control, capacity: 19 fiberglass parts per hour.
- (k) One (1) custom lamination booth, identified as SV402, constructed in 1998, equipped with flowchop gun systems and dry filters for overspray control, capacity: 19 fiberglass parts per hour.
- (I) One (1) grinding booth, identified as SV403, constructed in 1998, equipped with an air wall dust collection system exhausting inside the building for air pollution control, capacity: 2,179 pounds per hour.
- (m) One (1) gel coat reciprocator flat panel facility, identified as SV404, constructed in 1998, equipped with one (1) air- assisted spray gun and dry filters for overspray control, capacity: 5 flat panels per hour.
- (n) One (1) resin reciprocator flat panel facility, identified as SV405, constructed in 1998, equipped with one (1) resin reciprocator, and non-atomized spray application equipment for resin wet out, using dry filters for overspray control, capacity: 5 flat panels per hour.

(o) One (1) 52" wide belt sander for the flat panel operation, constructed in 1998, equipped with a 3-bag dust collection system for particulate control exhausting inside the building, maximum capacity: 250 pounds per hour.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Metal inert gas and oxyacetylene flame cutting operations at various locations in the four plants, with emissions less than 5 pounds per day or 1 ton per year of a single HAP, less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, and less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]
- (b) One (1) woodworking area equipped with a two bag dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter, located at Plant 3. [326 IAC 6-3-2]
- (c) One (1) panel cutter located at Plant 4, equipped with a drum collection system and no direct exhaust, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]
- (d) One (1) CNC wood cutting and one (1) CNC metal cutting machine, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (f) One (1) 4,000 gallon resin storage tank, known as Tank 102, constructed in 2004, and located at Plant No. 1, with VOC and HAP emissions less than 1.0 pounds per day.
- (g) One (1) 7,000 gallon resin storage tank, known as Tank 301, constructed in 2004, and located at Plant No. 3, with VOC and HAP emissions less than 1.0 pounds per day.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Officer (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance

Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 219-881-6712 Facsimile Number: 219-881-6745

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM,

OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
 - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
 - (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
 - (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by

the "responsible official" as defined by 326 IAC 2-7-1(34). Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.
- B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
 - (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
 - (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]
 - (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
 - (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

 The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

 The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regu-

lated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
 The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are
 applicable for any removal or disturbance of RACM greater than three (3) linear feet on
 pipes or three (3) square feet on any other facility components or a total of at least 0.75
 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
 The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible

official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal"

parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
 - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
 - (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

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C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Fiberglass and Surface Coating Operations

Plants 1 and 2 - US 33 West

- (a) One (1) metton injection area, known as MIJB1, constructed in 1994, equipped with four (4) metton injection presses, each with a maximum capacity of 50 parts per hour, emissions are uncontrolled and exhausting to stack SV204.
- (b) One (1) metton painting area, consisting of one (1) paint booth, known as MPB, constructed in 1994, and later updated to meet OSHA requirements, with one (1) paint mixing area. The paint booth is equipped with HVLP spray equipment, with a maximum capacity of 200 parts per hour, using dry filters as control equipment, and exhausting to stack SV207.
- (c) One (1) metton post final/final finish area, known as MFF, constructed in 1994, equipped with HVLP spray equipment, with a maximum capacity 200 parts per hour, equipped with dry filters for air pollution control, and exhausting to stack SV207.
- (d) One chop lamination booth, equipped with non-atomized spray application equipment, with a maximum capacity of 19 fiberglass parts per hour, using dry filters for overspray control, and exhausting to stack SV101.
- (e) One (1) Magnum portable air assisted airless gel coat system with a maximum capacity of 19 fiberglass parts per hour, using dry filters for overspray control, and exhausting to stack SV205.

Plant 3 - Elk Park Drive

- (g) One (1) gel coat booth, known as Booth B, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV301.
- (h) One (1) lamination booth, known as Booth A, constructed in 1996, with a maximum capacity 6.25 fiberglass parts per hour, using dry filters as control equipment, and exhausting to stack SV302.

Plant 4 - County Road 3 South

- (j) One (1) custom gel coat booth, identified as SV401, constructed in 1998, equipped air assisted airless spray equipment and dry filters for overspray control, capacity: 19 fiberglass parts per hour.
- (k) One (1) custom lamination booth, identified as SV402, constructed in 1998, equipped with flowchop gun systems and dry filters for overspray control, capacity: 19 fiberglass parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 039-9601-00493, issued on August 31, 1998, all operations, including the use of resins, gel coats, coatings, dilution solvents, and cleaning solvents at Plants 1, 2, 3 and 4, (with the exception of the flat panel facility at Plant 4), shall be limited such that the potential to emit (PTE) of Volatile Organic Compounds (VOC) shall be less than 250 tons per 12 consecutive month period. These facilities represent the "existing source" prior to the minor source modification also contained

in CP 039-9601-00493.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with this limit also partially satisfies the requirements of 326 IAC 8-1-6 (BACT) for the Plant 1 chop system (SV101), the Plant 2 gel coat system (SV205), the Plant 3 gel coat booth (A), the Plant 3 lamination booth (B), the Plant 4 custom gel coat (SV401) and the Plant 4 custom lamination booth (SV402).

Compliance with this limit shall be determined based upon the following criteria:

- (a) Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.
- (b) The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for injection molding shall be 1.0% of the input volatile organic compounds. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The Best Available Control Technology (BACT) conditions from CP 039-3322-00208, issued on August 24, 1994, and CP 039-6426-00392, issued on August 20, 1996, are no longer applicable. These conditions, requiring certain workplace practices and monthly limitations on VOC emissions are based upon AP-42 emission factors for fiberglass reinforced plastics operations. IDEM, OAQ, has determined that the AP-42 emission factors for these processes are no longer valid, and that the BACT should be reevaluated with emissions calculated using the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999. The revised BACT condition follows as Condition D.1.3.

D.1.3 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to the determination of Best Available Control Technology for VOC emissions from resin and gel coat application operations at the Plant 1 chop system (SV101), the Plant 2 gel coat system (SV205), the Plant 3 gel coat booth (A), the Plant 3 lamination booth (B), the Plant 4 custom gel coat (SV401) and the Plant 4 custom lamination booth (SV402), the Permittee shall comply with the following conditions:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) VOCs for the entire source (Plants 1, 2, 3 and 4, with the exception of the flat panel facility) shall be less than 250 tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, weight percent monomer that is VOC, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (2) Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) As a surrogate to volatile organic compounds (VOC) limits, resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	I
	HAP Monomer
	Content,
	Weight Percent
Resin, Manual or Mechanical Application	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	
	38
Production, Noncorrosion Resistant, Applied to	42
Thermoformed Thermoplastic Sheet	
Production, Class I, Flame and Smoke	60*
Shrinkage Controlled	52
Tooling	43
Gel Coat Application	
Production-Pigmented	37
Clear Production	44
Tooling	45
Production-Pigmented, subject to ANSI ^a standards	45
Production-Clear, subject to ANSI ^a standards	50

^a American National Standards Institute. * Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.12 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging <u>within</u> each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer

content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$^{\blacksquare}$$
 $Em_A \leq ^{\blacksquare}$ $(M_R * E_a)$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

Cross averaging between resin categories has been approved by IDEM OAQ for Global Composites. In these instances, the HAP monomer content limits for resins and gel shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging across categories:

"
$$Em_A \le$$
 " $(M_R * E_{Ra}) +$ " $(M_G * E_{Ga})$ Where:

 M_R = Total monthly mass of resins within each resin category

 $M_{\rm G} = Total$ monthly mass of gel coats within each gel coats category

 E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.

 $E_{Ga} = Emission factor for each gel coat based on allowable$

monomer content for each gel coat category

 Em_A = Actual monthly emissions from all resins and gel coats based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

- (c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:
 - (1) Production noncorrosion resistant, unfilled resins from all sources.
 - (2) Production, specialty product resins from all sources.
 - (3) Tooling resins used in the manufacture of watercraft.

- (4) Production resin used for Class I flame and smoke products.
 - Nonatomized application equipment means the devices where resin or gel coat material does any of the following:
- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressurefed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
 - Nonatomized application technology.
 - (2) Air-assisted airless.
 - Airless.
 - (4) High volume, low pressure (HVLP).
 - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (e) The work practice, cleaning, and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.1.4 shall be followed.

D.1.4 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

- (a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:
 - (1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
 - (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (4) Solvent collection containers shall be kept closed when not in use.
 - (5) Clean-up rags with solvent shall be stored in closed containers.
 - (6) Closed containers shall be used for the storage of the following:

- (A) All production and tooling resins that contain HAPs.
- (B) All production and tooling gel coats that contain HAPs.
- (C) Waste resins and gel coats that contain HAPs.
- (D) Cleaning materials, including waste cleaning materials.
- (E) Other materials that contain HAPs.
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
 - (1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
 - (6) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (A) Appropriate application techniques.
 - (B) Appropriate equipment cleaning procedures.
 - (C) Appropriate equipment setup and adjustment to minimize material usage and overspray.
 - (7) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (A) A copy of the current training program.
 - (B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) Pursuant to 326 IAC 20-25-3(d), on or after January 1, 2002 the following cleaning operations for resin and gel coat application equipment shall apply:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no

HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

- (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
- (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:
 - (1) Name and address of the owner or operator.
 - (2) Address of the physical location.
 - (3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

D.1.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total combined VOC content delivered to the applicators of the Plant 1 and 2 metton painting booth, known as MPB, and metton post final/final finish area, known as MFF, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the metton painting booth (MPB) and metton post final/final finish area (MFF) in Plants 1 and 2, and the gel coat booths and lamination booths in Plants 1, 2, 3 and 4 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5 (13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emissions units and any control devices.

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation in D.1.1 and Compliance with the HAP monomer content and usage limitations in Condition D.1.3 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.

- (c) Sampling and analysis, using any of the following test methods, as applicable:
 - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (d) An alternate method approved by IDEM, OAQ.

D.1.9 VOC Emissions

Compliance with Conditions D.1.1, D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.10 Particulate Matter (PM)

In order to comply with Condition D.1.6, the dry filters for PM control shall be in operation at all times when the spray booths, gel coat booths and lamination booths are in operation.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booths, gelcoat booths and lamination booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.3, and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Conditions D.1.1, D.1.3 and D.1.5.

- (1) The amount, VOC content and volatile organic HAP content of each resin, gel coat and paint. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the monthly usage of each resin, gelcoat and paint;
- (3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.
- (4) The cleanup solvent usage for each month;
- (5) The total VOC and volatile organic HAP usage for each month; and
- (6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4(b), the Permittee shall maintain the following training records:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.3, and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Plant 4 Flat Panel Facility

Plant 4 - County Road 3 South

- (m) One (1) gel coat reciprocator flat panel facility, identified as SV404, constructed in 1998, equipped with one (1) air- assisted spray gun and dry filters for overspray control, capacity: 5 flat panels per hour.
- (n) One (1) resin reciprocator flat panel facility, identified as SV405, constructed in 1998, equipped with one (1) resin reciprocator, and non-atomized spray application equipment for resin wet out, using dry filters for overspray control, capacity: 5 flat panels per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 039-9601-00493 issued on August 31, 1998, and the MACT determination under 326 IAC 2-4.1-1, operating conditions for the gel coat reciprocator flat panel facility, identified as SV404, and the resin reciprocator flat panel facility, identified as SV405, shall be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive months. Compliance with this limitation also makes the requirements 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Compliance with this limit shall be determined based upon the following criteria:

- (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
- (2) Until such time that new emissions information is made available by the U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

HAP Monomer
Content,
Weight Percent
48*
35*
38
42
60*
52
43
37
44
45
45
50

^a American National Standards Institute.

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.2.9 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging <u>within</u> each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

^{*} Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

For Averaging within a category:

 $^{\blacksquare}$ $Em_A \leq ^{\blacksquare}$ $(M_R * E_a)$

Where:

 $M_R = Total monthly mass of material within each category$

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat emissions = lbs of monomer

- (c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:
 - (1) Production noncorrosion resistant, unfilled resins from all sources.
 - (2) Production, specialty product resins from all sources.
 - (3) Tooling resins used in the manufacture of watercraft.
 - (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressurefed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
 - Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).

- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (e) Cleaning operations for resin and gel coat application equipment shall meet the following:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (f) The work practice and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.2.2 shall be followed.
- (g) The Permittee has demonstrated to the satisfaction of IDEM, OAQ that the following techniques inherent in the design of the flat panel manufacturing operation reduce emissions and can be considered equivalent to meeting the requirements of Conditions D.2.1 (c) and (d) listed above:
 - (1) Overhead mechanized spray reciprocator to apply all gel coats and resins, which minimizes overspray off the mold through proper placement of spray gun stops and spray gun pressure calibration according to guidelines published by IDEM, OAM. The spray gun type shall be high volume low pressure (HVLP) or the equivalent.
 - (2) Placement of wood panels and minimal period of roll-out immediately after the last resin application.

Hence, the use of the techniques listed above is hereby approved by IDEM, OAQ as alternatives to meeting the requirements of Conditions D.2.1 (c) and (d) provided the techniques are employed from the startup of operation. All other conditions stated in this permit remain in effect.

D.2.2 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

- (a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:
 - (1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
 - (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (4) Solvent collection containers shall be kept closed when not in use.

- (5) Clean-up rags with solvent shall be stored in closed containers.
- (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
- (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
 - (1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
 - (6) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (A) Appropriate application techniques.
 - (B) Appropriate equipment cleaning procedures.
 - (C) Appropriate equipment setup and adjustment to minimize material usage and overspray.
 - (7) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (A) A copy of the current training program.
 - (B) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

- (c) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:
 - (1) Name and address of the owner or operator.
 - (2) Address of the physical location.
 - (3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the gel coat reciprocator flat panel facility, identified as SV404, and the resin reciprocator flat panel facility, identified as SV405, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and any control devices.

Compliance Determination Requirements

D.2.5 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)

Compliance with the HAP monomer content and usage limitations in Condition D.2.1 shall be determined by one of the following:

- (1) The manufacturer's certified product data sheet.
- (2) The manufacturer's material safety data sheet.
- (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (4) An alternate method approved by IDEM, OAQ.

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.7 Particulate Matter (PM)

Pursuant to CP 039-9601-00493, issued on August 31, 1998, and in order to comply with Condition D.2.2, the dry filters for PM control shall be in operation at all times when the gel coat reciprocator flat panel facility, identified as SV404, and the resin reciprocator flat panel facility, identified as SV405, are in operation.

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gel coat reciprocator and the resin reciprocator stacks while one or more of the facilities are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -- Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Condition D.2.1.
 - (1) The amount, VOC content and volatile organic HAP content of each resin and gelcoat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the monthly usage of each resin and gelcoat;
 - (3) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used.
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and volatile organic HAP usage for each month; and
 - (6) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.2.2(b), the Permittee shall maintain the following training records:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.2.7 and D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Grinding

Plants 1 and 2 - US 33 West

(f) One (1) metton grinding area, known as MGB, constructed in 1994, with a maximum capacity 200 parts per hour, equipped with a water wash system as control equipment.

Plant 3 - Elk Park Drive

(i) One (1) grinding booth, known as Booth C, constructed in 1996, with a maximum capacity of 6.25 fiberglass parts per hour, equipped with a water wash system as control equipment.

Plant 4 - County Road 3 South

- (I) One (1) grinding booth, identified as SV403 constructed in 1998, equipped with an air wall dust collection system exhausting inside the building for air pollution control, capacity: 2,179 pounds per hour.
- (m) One (1) 52" wide belt sander, one (1) table saw and one (1) radial arm saw for the flat panel operation, constructed in 1998, equipped with a 3-bag dust collection system for particulate control exhausting inside the building, maximum capacity: 250 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plants 1 and 2 metton grinding booth (MGB) shall not exceed 7.59 pounds per hour when operating at a process weight rate of 5,014 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plant 3 grinding booth (C) shall not exceed 2.17 pounds per hour when operating at a process weight rate of 777 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plants 4 grinding booth, identified as SV003, shall not exceed 4.34 pounds per hour when operating at a process weight rate of 2,179 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Plants 4 belt sander shall not exceed 1.02 pounds per hour when operating at a process weight rate of 250 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.2 Particulate Matter (PM)

In order to comply with Condition D.3.1;

- (a) The water wash system for PM control shall be in operation at all times when the Plants 1 and 2 metton grinding booth, known as MGB, is in operation.
- (b) The water wash system for PM control shall be in operation at all times when the Plant 3 grinding booth (C) is in operation.
- (c) The air wall dust collection system for PM control shall be in operation at all times when the Plant 4 grinding booth (SV403) is in operation.
- (d) The 3-bag dust collection system for PM control shall be in operation at all times when the Plant 4 belt sander and saws are in operation.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) Metal inert gas and oxyacetylene flame cutting operations at various locations in the four plants, with emissions less than 5 pounds per day or 1 ton per year of a single HAP, less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs, and less than 5 pounds per hour or 25 pounds per day of particulate matter. [326 IAC 6-3-2]
- (b) One (1) woodworking area equipped with a two bag dust collector emitting less than 5 pounds per hour or 25 pounds per day of particulate matter, located at Plant 3. [326 IAC 6-3-2]
- (c) One (1) panel cutter located at Plant 4, equipped with a drum collection system and no direct exhaust, emitting less than 5 pounds per hour or 25 pounds per day of particulate matter.
- (d) One (1) CNC wood cutting and one (1) CNC metal cutting machine, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) The particulate matter (PM) emissions welding and flame cutting operations will be limited to 0.674 pounds per hour when operating at a process weight rate 135 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$$E = 4.10 \ P^{0.67}$$
 where $E =$ rate of emission in pounds per hour, and $P =$ process weight rate in tons per hour.

 $E = 4.10 (0.068 \text{ tons/hr})^{0.67} = 0.674 \text{ pounds per hour.}$

(b) The particulate matter (PM) emissions from the woodworking, panel cutting and metal cutting operations will be limited to 1.44 pounds per hour when operating at a process weight rate 420 pounds per hour.

The pounds per hour limitation was calculated from the following equation.

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour, and $P =$ process weight rate in tons per hour.

 $E = 4.10 (0.210 \text{ tons/hr})^{0.67} = 1.44 \text{ pounds per hour.}$

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5] [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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(c) Compliance with 326 IAC 8-3-5 (Cold cleaner degreaser operation and control) also satisfies the requirements of 326 IAC 8-3-2 (Cold cleaner operation).

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.3 Particulate Matter (PM)

In order to comply with Condition D.4.1, the dust collector for PM control shall be in operation at all times when the Plant 3 woodworking area is in operation.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT Office of Air Quality COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Global Composites, Inc.

Source Address: 58190 County Road 3 South, Elkhart, Indiana 46517

Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516

Part 70 Permit No.: T 039-7574-00493

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.			
Please check what document is being certified:			
Annual Compliance Certification Letter			
9 Test Result (specify)			
9 Report (specify)			
Notification (specify)			
9 Affidavit (specify)			
9 Other (specify)			
I certify that, based on information and belief formed after reasonable inquiry, the statements at information in the document are true, accurate, and complete.	nd		
Signature:			
Printed Name:			
Title/Position:			
Date:			

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Office of Air Quality **COMPLIANCE BRANCH** P.O. Box 6015 100 North Senate Avenue Indianapolis, Indiana 46206-6015

Phone: 317-233-5674 Fax: 317-233-5967

PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Global Composites, Inc.

Source Address: 58190 County Road 3 South, Elkhart, Indiana 46517

Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516

Part 70 Permit No.: T 039-7574-00493

This form consists of 2 pages

Page 1 of 2



This is an emergency as defined in 326 IAC 2-7-1(12)

The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and

The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, ma	rk N/A	Page 2 of 2
Date/Time Emergency started:		
Date/Time Emergency was corrected:		
Was the facility being properly operated at Describe:	the time of the emergency? Y	N
Type of Pollutants Emitted: TSP, PM-10, S	O ₂ , VOC, NO _X , CO, Pb, other:	
Estimated amount of pollutant(s) emitted de	uring emergency:	
Describe the steps taken to mitigate the pro	oblem:	
Describe the corrective actions/response s	teps taken:	
Describe the measures taken to minimize e	emissions:	
If applicable, describe the reasons why cor imminent injury to persons, severe damage of product or raw materials of substantial e	e to equipment, substantial loss of cap	
Form Completed by:		
Title / Position:		
Date:		
Phone:		

A certification is not required for this report.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT Office of Air Quality COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name:	Global Composites, Inc.
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Source Address: 58190 County Road 3 South, Elkhart, Indiana 46517

Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516

Part 70 Permit No.: T 039-7574-00493

Facility: Entire Source, Plants 1, 2, 3 and 4, excluding Flat Panel Manufacturing Operation at Plant 4

Parameter: Volatile Organic Compound emissions

Limit: Less than 250 tons per consecutive twelve (12) month period

Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic compound emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for injection molding shall be 1.0% of the input volatile organic compounds. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

Note: This form satisfies the reporting requirements of both Condition D.1.1 (326 IAC 2-2) and Condition D.1.3 (326 IAC 8-1-6).

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YEAF	₹.		

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9	No deviation occurred in this quarter.
9	Deviation/s occurred in this quarter. Deviation has been reported on:
Submitted by: Title / Position: Signature: Date: Phone:	

Attach a signed certification to complete this report.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT Office of Air Quality COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name:	Global Composites, Inc.

Source Address: 58190 County Road 3 South, Elkhart, Indiana 46517

Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516

Part 70 Permit No.: T 039-7574-00493

Facility: Plants 1 and 2 Metton Painting Booth (MPB) and Metton Final Finish area(MFF)

Parameter: Total Volatile Organic Compounds from both booths, as delivered to the

applicators

Limit: Less than 25 tons per consecutive twelve (12) month period

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- **9** No deviation occurred in this quarter.
- **9** Deviation/s occurred in this quarter.

Submitted by:

Title / Position:

Signature:

Date:

Phone:

Attach a signed certification to complete this report.

Deviation has been reported on:

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT Office of Air Quality COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Address: 58190 County Road 3 South, Elkhart, Indiana 46517

Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516

Part 70 Permit No.: T 039-7574-00493

Facility: Plant 4 Flat Panel Manufacturing Operation

Parameter: Volatile Organic HAP emissions

Limit: Less than 100 tons per consecutive twelve (12) month period

Monthly usage by weight, percent volatiles, and method of application shall be recorded for each resin and solvent. Volatile organic HAP emissions shall be calculated by multiplying the usage of each resin and solvent by the emission factor that is appropriate for the percent volatiles or monomer content, and the method of application, and summing the emissions for all resins and solvents. Emission factors shall be obtained from a reference approved by IDEM, OAQ.

The emission factors approved for use by IDEM, OAQ for resin and gelcoat operations shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. The emission factors for all other VOC emitting compounds shall be 100% of the input volatile organic compounds.

Column 1	Column 2	Column 1 + Column 2	
This Month	Previous 11 Months	12 Month Total	

9	No deviation occurred in this quarter.
9	Deviation/s occurred in this quarter. Deviation has been reported on:
Submitted by: Fitle / Position: Signature: Date: Phone:	

Attach a signed certification to complete this report.

Source Name:

Source Address:

Date of Deviation:

Number of Deviations:

Response Steps Taken:

Probable Cause of Deviation:

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT Office of Air Quality COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

58190 County Road 3 South, Elkhart, Indiana 46517

Global Composites, Inc.

Mailing Address: 28967 US 33 West, Elkhart, Indiana 46516 Part 70 Permit No.: T 039-7574-00493 Months: _____ to ____ Year: ____ Page 1 of 2 This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period". **9**NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. 9THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD **Permit Requirement** (specify permit condition #) **Duration of Deviation: Date of Deviation: Number of Deviations: Probable Cause of Deviation: Response Steps Taken:** Permit Requirement (specify permit condition #)

Duration of Deviation:

Page 2 of 2

Permit Requirement	(specify	permit condition #)		
Date of Deviation:			Duration of Deviation:	
Number of Deviation	s:			
Probable Cause of D	eviatior	ո։		
Response Steps Tak	en:			
Permit Requirement	(specify	permit condition #)		
Date of Deviation:			Duration of Deviation:	
Number of Deviation	s:			
Probable Cause of D	eviatior	ո։		
Response Steps Tak	en:			
Permit Requirement	(specify	permit condition #)		
Date of Deviation:			Duration of Deviation:	
Number of Deviation	s:			
Probable Cause of D	eviatior	1:		
Response Steps Tak	en:			
	No deviation occurred in this month.			
	9 Deviation/s occurred in this month.			
		Deviation has been	reported on:	
	Submitted by:			
	Title/Po	osition:		
	Signati	ure:		
	Date:			
	Phone	·		

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Administrative Amendment

Source Background and Description

Source Name: Global Composites, Inc.

Source Location: 58180 County Road 3 South, Elkhart, Indiana46517

County: Elkhart SIC Code: 3089

Operation Permit No.: T 039-7574-00493
Operation Permit Issuance Date: March 28, 2002
Administrative Amendment No.: A 039-18714-00493
Permit Reviewer: Patrick Brennan/MES

The Office of Air Quality (OAQ) has reviewed an application from Global Composites, Inc., requesting several minor changes to their Part 70 operating permit. The Office of Air Quality has determined that these changes are administrative, and can be processed as an Administrative Amendment. The changes are summarized as follows:

- The addition of one (1) non-atomized spray application system to the chop/lamination booth in Plant 1. This equipment is being added to increase manufacturing flexibility, and does not represent an increase in production capacity or in the potential to emit. The potential to emit from this facility is based on a production rate of 19 parts per hour, which will not change.
- 2. The addition of one (1) non-atomized spray application system to the resin reciprocator flat panel operation in Plant 4. This equipment is also being added to increase manufacturing flexibility, and does not represent an increase in production capacity or in the potential to emit. The potential to emit from this facility is based on a production rate of 5 flat panels per hour, which will not change.
- 3. The addition of one (1) 7,000 gallon resin storage tank, known as Tank 301, at Plant 3, and one (1) 4,000 gallon resin storage tank, known as Tank 102, at Plant 1. These tanks will replace resin storage currently done using 250 gallon totes. Fugitive styrene emissions from the totes are currently included in the quarterly emission reports from the source. These tanks will have VOC and HAPs emissions of less than one pound per day, and will therefore be considered insignificant activities.
- 4. The corporate name has changed from Global Glass, Inc. to Global Composites, Inc. This change will be incorporated into the permit.

Elkhart, Indiana Permit Reviewer: PTB/MES

History/Source Definition

On March 23, 2004, Global Composites, Inc. submitted an application to the OAQ requesting several minor changes to their Part 70 operating permit.

The source currently operates at four locations

- (a) Plant 1 is located at 28967 U.S. 33 West, Elkhart, Indiana;
- (b) Plant 2 is located at 28967 U.S. 33 West, Elkhart, Indiana;
- (c) Plant 3 is located at 56807 Elk Park Drive, Elkhart, Indiana; and
- (d) Plant 4 is located at 58190 County Road 3 South, Elkhart, Indiana.

It was determined during the review process for the original Part 70 permit, T 039-7574-00392, issued on March 28, 2002, that the four (4) plants are located on adjacent properties, have similar SIC codes, have support relationships, and are owned by one company. They were therefore considered one source.

The permit was subsequently administratively amended under AA 039-15911-00493, issued on October 28, 2002, to correct the source location and mailing addresses. The official address for the combined source is now Plant 4, and all four (4) plants report emissions under the Plant ID for Plant 4, which is 00493. This is also the Plant ID for all subsequent modifications and amendments. The mailing address for the combined source is the Plant 1 and 2 location at U.S. 33 West, Elkhart, IN 46516.

Recommendation

The staff recommends to the Commissioner that the Part 70 Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 23, 2004.

Emission Calculations

The addition of non-atomized spray application systems to the chop/lamination booth in Plant 1, and the resin reciprocator flat panel operation in Plant 4, will result in no increase in emissions. Emissions from these facilities are based upon production capacity, which will not change.

VOC and HAPs emissions from the one (1) 7,000 gallon resin storage tank, known as Tank 301, to be installed at Plant 3, and the one (1) 4,000 gallon resin storage tank, known as Tank 102, to be installed at Plant 1, have been evaluated by OAQ staff using the U.S. EPA Tanks 4.0 program. It has been determined that these tanks will have VOC and HAPs emissions of less than one pound per day each, and will therefore be considered insignificant activities.

Global Composites, Inc.

Page 3 of 4

Elkhart, Indiana

Administrative Amendment 039-18714-00493

Permit Reviewer: PTB/MES

Federal Rule Applicability

NSPS Subpart Kb

(a) On October 15, 2003, revisions to 40 CFR 60, Subpart Kb, became effective. As of the date this amendment is being issued, these revisions have not been incorporated into the Indiana state rules. Therefore, the requirements from the previous version of 40 CFR 60, Subpart Kb, published in the federal register on August 8, 1987, which is referenced by 326 IAC 12, will remain applicable until the revisions are incorporated into the Indiana State Implementation Plan (SIP).

(b) Pursuant to 40 CFR 52, Subpart P, and 326 IAC 12, the one (1) 7,000 gallon resin storage tank, known as Tank 301, to be installed at Plant 3, and the one (1) 4,000 gallon resin storage tank, known as Tank 102, to be installed at Plant 1, constructed after July 23, 1984, are not subject to NSPS, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) because each has a capacity less than forty (40) cubic meters. Pursuant to 40 CFR 60.110b, the requirements of 40 CFR 60, Subpart Kb, will still not be applicable after the rule revision because the capacity of each tank is less than seventy-five (75) cubic meters.

NESHAP Subpart WWWW

- (a) Because Global Composites, Inc. is a major source of HAPs, the reinforced plastic composites production operations are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Global Composites, Inc. is classified as an existing affected source under this rule, because production commenced at the source prior to August 2, 2001. The additional spray equipment described in this amendment has no effect on this classification.
- (b) On July 29, 2003, Global Composites, Inc. submitted an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) in letters to both OAQ and the U.S. EPA.
- (c) The Permittee shall submit an application for a significant permit modification on or before July 21, 2005, which is nine (9) months prior to the compliance date for the MACT (April 21, 2006). Because this rule has a future compliance date; the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the amendment.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as strikeouts, new language appears in **bold**):

1. The cover page of the permit has been changed to reflect the corporate name change.

Global **Composites** Glass, Inc. 58190 County Road 3 South Elkhart, Indiana 46517

- 2. Item d in the equipment list in Section A.3 has been changed as follows:
 - (d) One **chop lamination booth** (1) Venus portable chop system, equipped with **non-atomized** spray application equipment one (1) pro-flow control application gun with a fluid impingement tip, with a maximum capacity of 19 fiberglass parts per hour, using dry filters

for overspray control, and exhausting to stack SV101.

This description describes the chop laminating process, but is not dependent upon a specific number of spray guns. The actual number of guns does not affect PTE or production capacity.

- 3. Item n in the equipment list in Section A.3 has been changed as follows:
 - (n) One (1) resin reciprocator flat panel facility, identified as SV405, constructed in 1998, equipped with one (1) resin reciprocator, and non-atomized spray application equipment for resin wet out, fluid impingement gun and using dry filters for overspray control, capacity: 5 flat panels per hour.

This description describes the flat panel facility, but is not dependent upon a specific number of spray guns. The actual number of guns does not affect PTE or production capacity.

- 4. The equipment list of insignificant activities in Section A.4 has been revised to include the two new resin storage tanks, as follows:
 - (f) One (1) 4,000 gallon resin storage tank, known as Tank 102, constructed in 2004, and located at Plant No. 1, with VOC and HAP emissions less than 1.0 pounds per day.
 - (g) One (1) 7,000 gallon resin storage tank, known as Tank 301, constructed in 2004, and located at Plant No. 3, with VOC and HAP emissions less than 1.0 pounds per day.
- 5. Item (d) in the equipment list in Section D.1 has been revised as follows:
 - (d) One **chop lamination booth** (1) Venus portable chop system, equipped with **non-atomized spray application equipment** one (1) pro-flow control application gun with a fluid impingement tip, with a maximum capacity of 19 fiberglass parts per hour, using dry filters for overspray control, and exhausting to stack SV101.
- 6. Item (n) in the equipment list Section D.2 has been revised as follows:
 - (n) One (1) resin reciprocator flat panel facility, identified as SV405, constructed in 1998, equipped with one (1) resin reciprocator, and non-atomized spray application equipment for resin wet out, fluid impingement gun and using dry filters for overspray control, capacity: 5 flat panels per hour.
- 7. All reporting forms on pages 49 through 56 of the permit have been revised to reflect the corporate name change from Global Glass, Inc. to Global Composites, Inc.